



RECEIVED
James B. Wright
Senior Attorney
2003 NOV 26 AM 10:42

T.R.A. DOCKET ROOM

21
NCWAFR0313
14111 Capital Boulevard
Wake Forest, NC 27587-5900
Voice 919 554 7587
Fax 919 554 7913
james.b.wright@mail.sprint.com

November 25, 2003

Guy M. Hicks
BellSouth Telecommunications, Inc.
333 Commerce Street, Suite 2101
Nashville, TN 37238

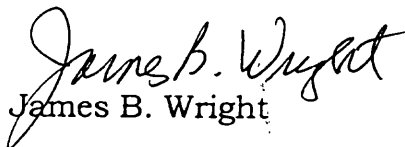
Re: *Implementation of the Federal Communications Commission's
Triennial Review Order (9 Month Proceeding) - Loop and Transport
Docket No. 03-00527*

Dear Mr. Hicks:

Enclosed are the responses and objections of United Telephone-Southeast, Inc. to BellSouth's First Set of Interrogatories and Requests for Production of Documents issued in the above proceedings.

Should you have any questions, please contact me.

Sincerely,


James B. Wright

cc: Chairman Deborah Taylor Tate, Chairman (14 copies)
Interested Parties Counsel of Record (one copy)

CERTIFICATE OF SERVICE
Docket No. 03-00527 Loop and Transport

I hereby certify that on November 25, 2003, a copy of United Telephone-Southeast, Inc.'s response and objections to BellSouth discovery was served on the following parties of record by air express, by electronic service or via United States mail, postage paid and properly addressed to the following:

Henry Walker, Esquire
Boult, Commings, et al.
414 Union Street, #1600
Nashville, TN 37219-8062

Charles B. Welch, Esquire
Farris, Mathews, et al.
618 Church St., #300
Nashville, TN 37219

Martha M. Ross-Bain, Esquire
AT&T
1200 Peachtree Street, Suite 8100
Atlanta, GA 30309

Timothy Phillips, Esquire
Office of Tennessee Attorney General
P. O. Box 20207
Nashville, TN 37202

H. LaDon Baltimore, Esquire
Farrar & Bates
211 Seventh Ave. N., #320
Nashville, TN 37219-1823

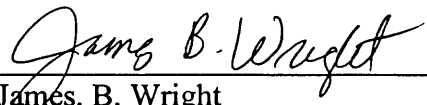
Nanette S. Edwards, Esquire
ITC^DeltaCom.
4092 S. Memorial Pkwy
Huntsville, AL 35802

Jon E. Hastings, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062

Dale Grimes, Esquire
Bass, Berry & Sims
315 Deaderick St., #2700
Nashville, TN 37238-3001

Guy M. Hicks, Esquire
BellSouth Telecommunications, Inc.
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300

Guilford F. Thornton, Jr.
Stokes, Bartholomew, et. al.
424 Church St., Suite 2800
Nashville, TN 37219-2386



James. B. Wright

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In Re:

FCC's Triennial Review Order (Nine Month
Proceeding) Loop and Transport

Docket No. 03-00527

**UNITED TELEPHONE-SOUTHEAST, INC.'S
RESPONSES AND OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS INC.
FIRST SET OF INTERROGATORIES**

COMES NOW United Telephone-Southeast, Inc. ("Sprint") and hereby files the following responses and objections to the First Set of Interrogatories issued by BellSouth Telecommunications, Inc. ("BellSouth") in the above-styled docket... These Responses and Objections are being provided by Sprint pursuant to the October 27, 2003 Order Establishing Procedural Schedule issued in this case, as modified by the November 20, 2003 Order Denying Joint Motion in Part and Granting Joint Motion in Part and Re-establishing Procedural Schedule ("Procedural Orders").

GENERAL OBJECTIONS

Sprint makes the following general objections. These general objections apply to each of the Requests and are to be incorporated by reference into Sprint's responses.

1. To the extent that BellSouth's Interrogatories ("Requests") seek to impose an obligation on Sprint to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this docket, Sprint objects on the grounds that such requests are irrelevant, overly broad, burdensome, oppressive and not permitted by the applicable discovery rules.

2. Sprint interprets the Requests to apply to Sprint's regulated intrastate operations in Tennessee and the nine states in the BellSouth region as provided in the Procedural Orders and will limit its Responses accordingly. To the extent that any Request is intended to apply to matters outside BellSouth's nine state region, Sprint objects on the grounds that such requests are irrelevant, overly broad, burdensome, oppressive and not permitted by the applicable discovery rules.
3. Sprint objects to each and every one of these Requests to the extent that they request information which is exempt from discovery by virtue of the work product doctrine, attorney-client privilege, or other applicable privilege.
4. Sprint objects to each Request and instruction in so far as such Request or instruction is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations, but are not properly defined or explained for purposes of these Requests.
5. Sprint objects to these Requests to the extent that they seek information that is not relevant to any issue in this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence.
6. Sprint objects to BellSouth's Requests to the extent that they seek to impose obligations on Sprint that exceed the requirements of the Tennessee Rules of Civil Procedure or other applicable Tennessee law or Authority regulation.
7. Sprint objects to BellSouth's Requests to the extent that they require the production of documents or information that is in the public domain, or on record with the Authority or the Federal Communications Commission, or which is already in BellSouth's possession, custody or control.

8. Sprint objects to each Request to the extent responding would be unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. To the extent that BellSouth's Requests seek trade secrets, confidential research, development or commercial information or other confidential or proprietary information, Sprint objects. Subject to any other applicable objections, Sprint will provide such information in accordance with any Protective Order issued in this docket.

10. Sprint is a large corporation with employees located in many different locations across the United States. In the course of conducting business on a nationwide basis, Sprint creates numerous documents that are not subject to either Authority or FCC record retention requirements. These documents are kept in numerous locations and frequently are moved from location to location as Sprint employees change jobs, or as Sprint's business objectives changes. Accordingly, it is possible that not every document has been identified in response to these Requests. Sprint will conduct a reasonable and diligent search of those files that are reasonably expected to contain the Requests documents or information. To the extent that BellSouth's Requests seek to require more, Sprint objects on the grounds that compliance would be unduly burdensome, expensive and extremely time consuming.

11. Sprint objects to each and every one of these Requests to the extent that they seek to have Sprint create documents or information not in existence at the time of the discovery request.

Any responses provided by Sprint to BellSouth's requests will be provided subject to, and without waiver of, the foregoing objections. Sprint will make partial responses to the extent reasonably consistent with Sprint's objections.

RESPONSES TO INTERROGATORIES

Q1. Affirm or deny that you have self-provided high capacity transport facilities that you own (i.e., any DS3 or greater facilities, including dark fiber) that provide transport along a route between a pair of ILEC central offices or wire centers in each/any of the nine Southeastern states for use in your own operations. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each central office of the pair and be operationally ready to provide transport into or out of each office of the pair. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you “own” transport facilities if (i) you have legal title to the facility; or (ii) if you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

A1. See General Objection No. 2 and 5. United Telephone-Southeast only operates in Tennessee as far the nine state BellSouth region. United Telephone-Southeast is the incumbent LEC for northeast Tennessee and does not own, lease from or lease to third-parties any of the described facilities outside its incumbent territory. United Telephone-Southeast does not seek to challenge the national finding of impairment of transport within its own service area at this time so to the extent this Interrogatory seeks such information, such request is not relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

Response to Question 1									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	x

Q2. Affirm or deny that you offer to carriers on a wholesale basis DS1 or higher transport facilities, or dark fiber transport facilities that you own that provide a route between a pair of ILEC central offices or wire centers, to one or more pair of wire centers, in each/any of the nine states. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you “own” a facility (i) if you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this response.

A2. See General Objection No. 2 and 5 and response to Interrogatory No. 1. United Telephone-Southeast only operates in Tennessee as far the nine state BellSouth region. United Telephone-Southeast is the incumbent LEC for northeast Tennessee and does not own, lease from or lease to third-parties any of the described facilities outside its incumbent territory.

Response to Question 2									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	x

Q3. Affirm or deny whether you have acquired on a wholesale basis from a third party (other than the ILEC or a CLEC that is a party to this proceeding) DS1, DS3, or dark fiber transport between two or more ILEC central offices in each/any of the Southeastern states. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6)) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair.

A3. See General Objection No. 2 and 5 and response to Interrogatory No. 1. United Telephone-Southeast only operates in Tennessee as far the nine state BellSouth region. United Telephone-Southeast is the incumbent LEC for northeast Tennessee and does not own, lease from or lease to third-parties any of the described facilities outside its incumbent territory.

Response to Question 3									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	x

Q4. For each state in Question 1 that you answered in the affirmative (that you have deployed or self-provide high capacity transport for use in your own operations), provide a list of all the paired ILEC CO to ILEC CO routes on which you have deployed such facilities identifying:

- The CLLI codes of the paired ILEC CO locations that make up each and every route. In each case show the "low alpha" (alphabetically first) CLLI code as Wire Center A and the "high alpha" CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)
- Whether your self-provided transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6))

at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code for the collocation arrangement.

- c. Whether your self-provided transport facilities are provisioned entirely on facilities you own (as defined in Question 1).
- d. If any of your self-provided transport facilities include facilities obtained through third parties (Yes, No); if your response is yes, indicate the vendor name.
- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- f. Whether you are able to immediately provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

A4. Not applicable.

Q5. For each state in Question 2 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher, or dark fiber capacity transport) provide a list of all ILEC CO to ILEC CO routes along which you provide such transport identifying:

- a. The CLLI codes of the paired ILEC CO locations that make up the end points of each and every route. In each case show the "low alpha" (alphabetically first) CLLI code as Wire Center A and the "high alpha" CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)
- b. Whether your wholesale transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code of the collocation arrangement.
- c. Whether your wholesale transport services are provisioned entirely on facilities you own (as defined in Question 2).
- d. If any of your self-provided transport facilities include facilities obtained through third parties, indicate the vendor name.
- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- f. Whether you are willing and able immediately to provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

A5. Not applicable.

Q6. For each state in Question 3 that you answered in the affirmative (that you have acquired on a wholesale basis DS1, DS3 or higher, or dark fiber transport), provide the following in electronic format using the worksheet related to both self-provided (the Question 4 spreadsheet) and wholesale facilities (the Question 5 spreadsheet):

- a. The CLLI codes of the ILEC wire centers or COs of the starting and ending points of the transport routes;
- b. The name of the carrier or company from whom you received or purchased the transport;
- c. Whether you are operationally ready to provide transport using these facilities; and
- d. The capacity deployed and the capacity active on the route as of September 30, 2003.

A6. Not applicable.

Q7. If, in response to Questions 4 and 5, you denied any of the specified characteristics, explain in detail the basis for your response. For example, if your wholesale operations are affiliated with another provider, state the name of the provider with whom you are affiliated. State also whether there are other limitations on your wholesale operations; if so, describe in detail any such limitations.

A7. See General Objection No. 2 and 5 and response to Interrogatory No. 1. United Telephone-Southeast only operates in Tennessee as far the nine state BellSouth region. United Telephone-Southeast is the incumbent LEC for northeast Tennessee and does not own, lease from or lease to third-parties any of the described facilities outside its incumbent territory.

Q8. Affirm or deny that you have self-provided high capacity loop or dark fiber facilities that you own (i.e., any DS3 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states for use in your own operations in providing retail service to your customers. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (ii) if it you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to, special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

A8. See General Objection No. 2 and 5. United Telephone-Southeast only operates in Tennessee as far the nine state BellSouth region. United Telephone-Southeast is the incumbent LEC for northeast Tennessee and does not own, lease from or lease to third-parties any of the described facilities outside its incumbent territory. United Telephone-Southeast does not seek to challenge the national finding of impairment of loops within its own service area at this time so to the extent this Interrogatory seeks such information, such request is not relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

Response - Question 8: Self-provided facilities for providing retail service									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	x

Q9. Affirm or deny that you offer to carriers on a wholesale basis DS1, DS3 or higher capacity loop facilities or dark fiber that you own (i.e., any DS1 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a facility if (i) you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this response.

A9. See General Objection No. 2 and 5 and response to Interrogatory No. 8. United Telephone-Southeast only operates in Tennessee as far the nine state BellSouth region. United Telephone-Southeast is the incumbent LEC for northeast Tennessee and does not own, lease from or lease to third-parties any of the described facilities outside its incumbent territory.

Response - Question 9: Self-provided facilities offered on wholesale basis									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	x

Q10. Affirm or deny that you have obtained from a third party (other than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of retail services to your customers, to one or more customer locations in each/any of the nine Southeastern states. Self-provided facilities that you “own” as defined in 8 above should not be included in this response.

A10. See General Objection No. 2 and 5 and response to Interrogatory No. 8. United Telephone-Southeast only operates in Tennessee as far the nine state BellSouth region. United Telephone-Southeast is the incumbent LEC for northeast Tennessee and does not own, lease from or lease to third-parties any of the described facilities outside its incumbent territory.

Response - Question 10: 3 rd Party facilities leased for providing retail service									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	x

Q11. Affirm or deny that you have obtained from a third party (other than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of services on a wholesale basis to one or more customer locations in each/any of the nine Southeastern states. Self-provided facilities that you “own” as defined in 9 above should not be included in this response.

A11. See General Objection No. 2 and 5 and response to Interrogatory No. 8. United Telephone-Southeast only operates in Tennessee as far the nine state BellSouth region. United Telephone-Southeast is the incumbent LEC for northeast Tennessee and does not own, lease from or lease to third-parties any of the described facilities outside its incumbent territory.

Response - Question 11: 3 rd Party facilities leased for reselling as wholesale service									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	x

Q12. For each state in Question 8 and 10 that you answered in the affirmative (that you have self-provided or obtained from a third party other than the ILEC or a CLEC that is a party to this proceeding high capacity loops or dark fiber for use in your own operations in providing retail service to your customers) provide a list of the customer locations to which you have deployed such loops, (in electronic format using the attached spreadsheets) identifying:

- a. The RSAG valid address of each customer location.
- b. The CLLI code of the CLEC switch, wire center, collocation, point of interconnection, etc., from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)
- c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
- d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis (Yes, No).
- e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to address such restrictions.
- f. The capacity deployed and capacity activated to the specific location as of September 30, 2003.

A12. Not applicable.

Q13. For each state in Questions 9 and 11 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher capacity loops) provide a list of the customer locations to which you have provided such loops (in electronic format using the attached spreadsheets), identifying:

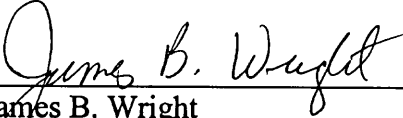
- a. The RSAG valid address of each customer location.
- b. The CLLI code of the location from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)
- c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
- d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis or UNE basis (Yes, No).
- e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space,

house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to eliminate such restrictions.

- f. Indicate whether other carriers have access to these wholesale facilities at a technically feasible point (e.g., manhole, meet point, collocation, etc).
- g. The capacity deployed and capacity activated to the specific location as of September 30, 2003.

A13. Not applicable.

Respectfully submitted this 25th day of November, 2003.



James B. Wright
Sprint
14111 Capital Blvd
Wake Forest, NC 27587
Tel. 919-554-7587; Fax 919-554-7913
Email: james.b.wright@mail.sprint.com
Attorney for Sprint